

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

PAR PHARMACEUTICAL, INC., and ENDO)	
PAR INNOVATION COMPANY, LLC,)	
)	
Plaintiffs,)	
)	C.A. No. _____
v.)	
)	
ZYDUS PHARMACEUTICALS (USA) INC.)	
and ZYDUS LIFESCIENCES LTD.)	
)	
Defendants.)	
)	

**PLAINTIFFS' MOTION FOR A TEMPORARY RESTRAINING ORDER,
PRELIMINARY INJUNCTION, AND EXPEDITED DISCOVERY**

Pursuant to Federal Rule of Civil Procedure 65 and 35 U.S.C. §§ 271(g) and 283, Plaintiffs Par Pharmaceutical, Inc. and Endo Par Innovation Company, LLC respectfully move the court to issue a temporary restraining order and preliminary injunction barring Defendants Zydus Pharmaceuticals (USA) Inc. and Zydus Lifesciences Ltd. from further importing and selling their generic varenicline tartrate tablet products, as well as expedited discovery. Given the nature of this request, Plaintiffs respectfully request expedited briefing and consideration of this Motion.

The specific grounds for this motion are set forth in the concurrently-filed opening brief, as supported by the Declarations of Robert Rhoad, Mark Bradley, and David Dodds. A proposed order is attached.

Copies of the Complaint, this Motion, and the supporting materials are being served by email on outside counsel for Defendants: James Peterka, Locke Lorde LLP (JPeterka@lockelord.com).

Dated: August 8, 2023

Respectfully submitted,

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